

Felony

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

for the

Southern District of Texas

APR 4 2019

United States of America)

v.)

Case No.

David J. Bradley, Clerk of Court

(1) Hector MONCLOVA-Perez)

(2) Ksandra MEDRANO)

Defendant(s)

*B19-MJ-434***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/3/2019 in the county of Cameron in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. 841(a)(1) and
 21 U.S.C. 846

Possession with Intent to Distribute
 approximately 161.76 kgs of marijuana, a
 schedule 1 controlled substance.

This criminal complaint is based on these facts:

See Attachments

☒ Continued on the attached sheet.

Albert Toriz
 Complainant's signature
 Albert Toriz, DEA Task Force Officer
 Printed name and title

Sworn to before me and signed in my presence.

Date: 4/4/2019City and state: Brownsville, Texas

Ronald G. Morgan
 Judge's signature
 Ronald G. Morgan, US Magistrate Judge
 Printed name and title

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United States

V.

(1) Hector MONCLOVA-Perez

(2) Ksandra MEDRANO

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ATTACHMENT

(AFFIDAVIT)

On April 3, 2019, at approximately 9:10 a.m., a call was sent out over the Border Patrol Service radio of possible narcotics between Los Fresnos pump rd. and Water Tower Rd. in Brownsville, Cameron County, Texas. Border Patrol Agents in the area responded to the call.

Remote Video Surveillance System (RVSS) Agent advised via service radio of possible scouts near Los Fresnos Pump. Border Patrol Agents started setting up around the area covering all possible exit routes.

RVSS Agent then advised of a white pickup truck entering Los Fresnos Pump rd., minutes later RVSS Agent advised via radio of the white pickup truck exiting Los Fresnos Pump rd. and saw what appeared to be bundles in the bed of the truck.

Agents responded to the exact area and got behind the white truck. Agents activated their overhead emergency lights of their service units in an attempt to keep the vehicle away from Hwy 281. Agents saw two passengers in the vehicle as it refused to stop. The White pickup truck bearing Texas license plates [REDACTED] went around the units and continued to travel north towards Hwy 281. Agents continued to follow the vehicle calling out direction of travel for other agents in the area to assist.

Vehicle continued traveling through numerous streets disregarding any law enforcement attempting to conduct the vehicle stop. Agents continued to follow the vehicle and advising of the situation via radio. Vehicle drove on 802 to Sunrise Mall, then to Pablo Kisel Rd. where it came to a stop after striking a palm tree. Driver attempted to maneuver out again but was surrounded by Border patrol Agents who extracted the driver and passenger from the white truck. Throughout the entire pursuit agents never lost sight of the white truck.

The driver identified as (Hector MONCLOVA-Perez) and passenger as (Ksandra MEDRANO) were both detained and placed into Border Patrol units.

After subjects were secured agents seize 5 bundles in the bed of the truck and 8 bundles inside the cabin which later field tested positive for marijuana for a total of 13 bundles.

Agents also recovered an H&K P200 Pistol bearing serial number (123-076923) located on the passenger floor board of the white truck. Record checks on the pistol revealed pistol was reported stolen on October 28, 2018. Pistol is registered to Department of Homeland Security. Agents also recovered 9 fully loaded magazines (12 rounds in each magazine) with 1 magazine in the pistol a round in the chamber and 103 loose rounds in the center console of the vehicle.

A criminal history check revealed that neither MONCLOVA-Perez nor MEDRANO were convicted felons.

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The total weight of the marijuana was 161.76 kg (356.55 lbs.) with an estimated value of \$285,240.00 (USD).


Complainant's Signature

Albert Toriz, DEA Task Force Officer
Printed Name and Title

Sworn to before me, and subscribed in my presence,

Date: April 4, 2019,

City and State: Brownsville, Texas


Judge's Signature

Ronald G. Morgan, United States Magistrate
Printed Name and Title